

# Exhibit 1

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**From:** Thorne, John  
**Sent:** Friday, August 16, 2024 10:01 AM  
**To:** Reiser, Craig M.  
**Subject:** RE: VM

Craig: Sorry I missed your call. Thanks for your voicemail. Don't you think that any particularized need that Google could demonstrate could be addressed by a more limited disclosure?

As I mentioned yesterday, Daily Mail and Gannett would consider a proposal that let your in-house counsel review your work product such as drafts of discovery letters or summary judgment briefs. That would allow your clients to supervise your work but would not have them reading all the privilege logs, transcripts, and other discovery materials.

Best regards, JT

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**From:** Reiser, Craig M. <creiser@axinn.com>  
**Sent:** Friday, August 16, 2024 9:28 AM  
**To:** Thorne, John <jthorne@kellogghansen.com>  
**Subject:** [EXTERNAL] RE: VM

Re-sending because the attachment for some reason didn't come through.

**Craig M. Reiser**  
*Partner*



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**Axinn.com**

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**From:** Reiser, Craig M.  
**Sent:** Friday, August 16, 2024 9:28 AM  
**To:** Thorne, John <[jthorne@kellogghansen.com](mailto:jthorne@kellogghansen.com)>  
**Subject:** VM

John,

Following on my voicemail, I discussed with my client and we are planning to file a motion today on the confidentiality issue if we can't get this resolved. The materials we're currently hoping to share with designated in-house counsel are outlined in Appendix A to the attached. Happy to discuss further, but wanted to give you a heads up now over email and voicemail since I am going to be tied up in meetings for most of the morning.

Craig

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